

CIVIL ACTION NO. 1:19-CV-444-LY

EXHIBIT A

**LAW OFFICE OF
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TELECOMMUNICATIONS COVER SHEET

TO: Floyd R. Hartley 1.303.551.6655
Attorney at Law
Taylor Anderson, LLP

CC:

FROM: Wes Griggs
Attorney At Law

DATE: May 2, 2019

TOTAL NUMBER OF PAGES INCLUDING THIS COVER SHEET: 5

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back as soon as possible at (979) 345-5188.

The person to contact is: *Michaela Nordin*

COMMENTS: RE: Cause No. D-1-GN-19-001591; J.E.B, individually and
as next friend to F.C.B., Plaintiff v. CLAY DEAN HILL,
individually and d/b/a SHILOH TREATMENT CENTER, SHILOH
TREATMENT CENTER, INC.); JUAN J. SANCHEZ, individually
and d/b/a, SOUTHWEST KEY; AND SOUTHWEST KEY
PROGRAMS, INC, Defendant; In the 419th Judicial District
Court; Travis County, Texas

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CAUSE NO. D-1-GN-19-001591

**J.E.B., individually and as next
friend to F.C.B.,
Plaintiff**

VS.

**CLAY DEAN HILL, individually and
d/b/a SHILOH TREATMENT CENTER,
SHILOH TREATMENT CENTER,
INC.); JUAN J. SANCHEZ,
individually and d/b/a, SOUTHWEST
KEY; AND SOUTHWEST KEY
PROGRAMS, INC,
Defendant**

**§ IN THE DISTRICT COURT
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§ TRAVIS COUNTY, TEXAS
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§ 419TH JUDICIAL DISTRICT**

ORIGINAL ANSWER OF THE DEFENDANT CLAY DEAN HILL

TO THE HONORABLE COURT:

Clay Dean Hill (last three numbers of Social Security number: 272; last three numbers of Texas drivers license number: 722) (the Defendant Hill) files this original answer to the Plaintiff's original petition, and for answer shows:

1. Special Exceptions

The Defendant Hill specially excepts to the Plaintiff's Original Petition in its entirety. The Plaintiff purports to state a claim against the Defendant Hill by referring to him and the separate, corporate defendant, Shiloh Treatment Center Inc., collectively as "Shiloh" and yet nowhere states any basis in fact or at law for a claim against the Defendant Hill, individually. The Defendant Hill requests that the Court make an order sustaining this special exception, requiring the Plaintiff to amend the petition to state a cause of action against the Defendant Hill, individually, separate and apart from, and as

distinguished from, the Defendant Shiloh Treatment Center, Inc. on or before such date as the Court may determine, and providing that, if the Plaintiff fails or refuses to amend, the action as to the Defendant Hill will be stricken from the pleadings, and the Defendant Hill will be dismissed from this lawsuit.

2. General Denial

Defendant Hill denies generally every allegation contained in Plaintiff's original petition and demands strict proof by a preponderance of the credible evidence.

3. Special Denial

Defendant Hill specially denies each and every allegation or implication contained in Plaintiff's original petition that he, individually, is liable under the facts which are the basis of this suit.

4. Request for Disclosure

Pursuant to Texas Rule of Civil Procedure 194, you are requested to disclose, within thirty (30) days of service of this request, the information and material described in Rule 194.2 as set forth on Exhibit A attached hereto.

WHEREFORE, the Defendant Hill requests judgment of the Court as follows:

1. That his Special Exceptions be sustained;
2. That this lawsuit as it pertains to the Defendant Hill be dismissed and that the Plaintiff take nothing by this suit;
3. That the Defendant Hill recover all costs together with such other and further relief to which the Defendant Hill may be entitled.

Respectfully submitted,



WES GRIGGS

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Attorney for Defendant Clay Dean Hill

JURAT

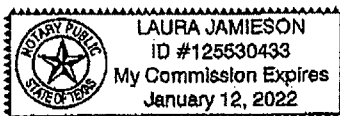
My name is Clay Dean Hill, and I am one and the same person who has been named as a defendant in the above referenced lawsuit. I declare under penalty of perjury that the foregoing Original Answer and that every statement contained in Paragraph 3, entitled "Special Denial" of the Original Answer are within my personal knowledge and are true and correct.


CLAY DEAN HILL

THE STATE OF TEXAS
COUNTY OF BRAZORIA

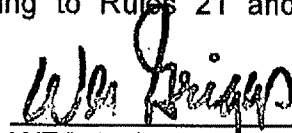
§
§

This instrument was acknowledged before me on the 1st day of May, 2019 by Clay Dean Hill.


Notary Public, State of Texas

Certificate of Service

I certify that on the 1st day of May 2019, a true and correct copy of this document was served to all parties according to Rules 21 and 21a of the Texas Rules of Civil Procedure.



WES GRIGGS